



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Red*
DATE: October 11, 1995
SUBJECT: Memo. to Commission - MUR 3774

The attached is submitted as an Agenda document
for the Commission Meeting of _____
Open Session _____
Closed Session _____

| CIRCULATIONS | | DISTRIBUTION | |
|----------------------|------|--------------------------------|------|
| 72 Hour Tally Vote | () | Compliance | (XX) |
| Sensitive | () | Audit Matters | () |
| Non-Sensitive | () | Litigation | () |
| 24 Hour Tally Vote | (XX) | Closed Letters | () |
| Sensitive | (XX) | MUR | () |
| Non-Sensitive | () | DSP | () |
| 24 Hour No Objection | () | Status Sheets | () |
| Sensitive | () | Advisory Opinions | () |
| Non-Sensitive | () | Other (See Distribution below) | |
| Information | () | | |
| Sensitive | () | | |
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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SENSITIVE

October 11, 1995

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble *[Signature]*
General Counsel

SUBJECT: Shorter Voting Deadline for Memorandum to
Commission in MUR 3774

Pursuant to the Circulated Vote Provisions of Directive 52, the Office of General Counsel is circulating the attached Memorandum to the Commission in MUR 3774 on a 24 hour tally basis in order to resolve the requested extension of time prior to the current October 16, 1995 due date.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 11, 1995

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

SUBJECT: MUR 3774 -- Request for Extension of Time from
National Republican Senatorial Committee

On August 1, 1995, the Commission found reason to believe that the National Republican Senatorial Committee and Stan Huckaby, as treasurer ("Respondents") violated 2 U.S.C. § 441a(f), 441b(a), and 11 C.F.R. § 102.5(a)(1)(i) by making payments from its non-federal account to non-profit groups to perform GOTV activity on behalf of specific federal candidates after having exhausted the NRSC's contribution and coordinated expenditure limits. On the same day the Commission also approved an Order to Submit Written Answers and Subpoena to Produce Documents directed to Respondents.

On September 20, Respondents timely requested,¹ and were granted, a 20-day extension of time due to the comprehensive nature of the Commission's discovery request. At the time of their request, Respondents also raised the possibility that additional time might be needed and stated that they would file a timely request if such an extension was necessary.

Attached is a timely second extension request from Respondents seeking an additional 14-day extension of time specifically to respond to the Commission's Factual and Legal Analysis. Counsel represents that Respondents will timely file their discovery response, currently due on October 16, but need additional time to prepare a thorough response to

1. Respondents were notified of the Commission's actions in this matter by letter dated August 8, 1995, sent by certified mail. When no certified mail receipt was received within a reasonable time, this Office contacted Respondents' counsel and was advised that counsel had not received the Commission's notification package. Accordingly a copy of the notification letter, discovery request and the Factual and Legal Analysis were hand-delivered to counsel's office on August 25, 1995, and this date has been used in calculating due dates.

the Factual and Legal Analysis since the discovery request was so "voluminous." This additional request results in a 34-day extension.

In light of counsel's representation that Respondents will timely comply with the discovery request, the comprehensive nature of that request, and the novel nature of the legal issues involved in this matter, an additional 14 days in which to respond to the Factual and Legal Analysis is not unreasonable. Moreover, this Office is currently reviewing discovery responses from three other respondents in this matter so an additional extension of ten work days will not delay the investigation. Therefore, this Office recommends that the Commission grant Respondents until October 30 to respond to the Commission's Factual and Legal Analysis.

RECOMMENDATION

1. Grant the National Republican Senatorial Committee and Stan Huckaby, as treasurer, an extension of time until October 30, 1995 to respond to the Commission's Factual and Legal Analysis.
2. Approve the appropriate letter.

Attachment

October 10, 1995 Request for Extension of Time

Staff Assigned: Dawn M. Odrowski